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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

11 MICHAEL BRADFORD,

12 Plaintiff,

13 v.

14 TRANS UNION, LLC, EXPERIAN  
15 INFORMATION SOLUTIONS, INC.,  
16 EQUIFAX INFORMATION SERVICES,  
17 LLC, PHH MORTGAGE CORPORATION,  
18 AND U.S. BANK, N.A.,

Defendants.

Case No.: 2:22-cv-01397-MMD-VCF

**STIPULATION AND ORDER EXTENDING  
TIME FOR DEFENDANT U.S. BANK, N.A.,  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(SECOND REQUEST)**

19 Plaintiff MICHAEL BRADFORD ("Plaintiff"), and by through his counsel, KIND LAW  
20 and FREEDOM LAW FIRM, and defendant U.S. BANK, N.A. ("Defendant" or "U.S. Bank"), by  
21 and through its counsel, DUANE MORRIS LLP, hereby stipulate to further extend the time for  
22 U.S. Bank to respond to Plaintiff's complaint up to and including **January 17, 2023**.

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This further extension will allow U.S. Bank's counsel, who were recently retained in this matter, to analyze the claims made and obtain and review any relevant documents. It will also provide Plaintiff and U.S. Bank additional time to evaluate whether an early resolution may be possible, as preliminary settlement discussions are ongoing. This further extension is also warranted in light of the upcoming holiday season which may impact efforts to obtain documents and information from the respective parties in a timely manner. This is the second request for an extension to U.S. Bank's deadline to respond to the complaint, and is made in good faith and not for the purpose of delay.

DATED November 10, 2022.

KIND LAW

DUANE MORRIS LLP

By: /s/ Michael Kind  
Michael Kind (SBN

By: /s/ Tyson E. Hafen  
Tyson E. Hafen (SBN 13139)

FREEDOM LAW FIRM

Attorneys for Defendant *U.S. BANK, N.A.*

George Haines (SBN 9411)  
Gerardo Avalos (SBN 15171)

Attorneys for Plaintiff

## ORDER

**IT IS SO ORDERED.**

Carl Gaddis

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**UNITED STATES MAGISTRATE JUDGE**

DATED: 11-14-2022